

1 PHILLIP A. TALBERT
United States Attorney
2 PAUL A. HEMESATH
KEVIN C. KHASIGIAN
3 Assistant U. S. Attorneys
501 I Street, Suite 10-100
4 Sacramento, CA 95814
Telephone: (916) 554-2700
5
6 Attorneys for the United States
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.
14 2019 MERCEDES-BENZ E63 AMG-S, VIN:
WDDZF8KB8KA608709, CALIFORNIA
15 LICENSE NUMBER 1UEV351,
16 APPROXIMATELY 0.041836 BITCOIN,
17 APPROXIMATELY 18.12902639 BITCOIN,
18 APPROXIMATELY 26.56443065 BITCOIN,
19 APPROXIMATELY \$1,712,611.00 IN U.S.
CURRENCY,
20 ONE (1) BITCOIN CASASCIUS COIN,
21 ONE (1) CANADIAN GOLD COIN,
22 ONE (1) AMERICAN EAGLE GOLD COIN,
23 ONE (1) CUMMINS ALLISON MONEY
COUNTER,
24 APPROXIMATELY \$3,050.00 SEIZED
FROM LAMASSU BTM LOCATED AT 1301
MACARTHUR BOULEVARD, OAKLAND,
CALIFORNIA,
25 APPROXIMATELY \$51,590.00 SEIZED
FROM LAMASSU BTM LOCATED AT 395

2:20-MC-00072-TLN-EFB

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

1 BIRD AVENUE, SAN JOSE, CALIFORNIA,

2 APPROXIMATELY \$2,475.00 SEIZED
3 FROM LAMASSU BTM LOCATED AT 1310
4 BROADWAY, OAKLAND, CALIFORNIA,

5 APPROXIMATELY \$1,945.00 SEIZED
6 FROM LAMASSU BTM LOCATED AT 1305
7 N. BASCOM, SAN JOSE, CALIFORNIA,

8 APPROXIMATELY \$20,090.00 SEIZED
9 FROM LAMASSU BTM LOCATED AT 996
10 PINE STREET, SAN FRANCISCO,
CALIFORNIA,

11 APPROXIMATELY \$3,115.00 SEIZED
12 FROM LAMASSU BTM LOCATED AT 25757 SOTO ROAD, HAYWARD,
13 CALIFORNIA,

14 APPROXIMATELY \$24,890.00 SEIZED
15 FROM LAMASSU BTM LOCATED AT 1894
UNIVERSITY AVENUE, BERKELEY,
16 CALIFORNIA,

17 APPROXIMATELY \$3,800.00 SEIZED
18 FROM LAMASSU BTM LOCATED AT 7500
COMMERCIAL BOULEVARD, COTATI,
19 CALIFORNIA,

20 APPROXIMATELY \$3,325.00 SEIZED
FROM LAMASSU BTM LOCATED AT
14701 SAN PABLO AVENUE, SAN PABLO,
CALIFORNIA,

21 APPROXIMATELY \$3,785.00 SEIZED
FROM LAMASSU BTM LOCATED AT 3210
BUSKIRK AVENUE, PLEASANT HILL,
22 CALIFORNIA,

23 APPROXIMATELY \$2,835.00 SEIZED
FROM LAMASSU BTM LOCATED AT 605
CONTRA COSTA BOULEVARD,
CONCORD, CALIFORNIA,

24 APPROXIMATELY \$6,480.00 SEIZED
FROM LAMASSU BTM LOCATED AT 860
ARDEN WAY, SACRAMENTO,
25 CALIFORNIA,

26 APPROXIMATELY \$22,660.00 SEIZED
FROM LAMASSU BTM, LOCATED AT
1151 GALLERIA BOULEVARD,
ROSEVILLE, CALIFORNIA,

1 APPROXIMATELY \$14,805.00 SEIZED
2 FROM LAMASSU BTM LOCATED AT 5127
3 FRANKLIN BOULEVARD, SUITE 1,
4 SACRAMENTO, CALIFORNIA,

5 APPROXIMATELY \$10,340.00 SEIZED
6 FROM LAMASSU BTM LOCATED AT 620
7 W. CHARTER WAY, STOCKTON,
8 CALIFORNIA,

9 APPROXIMATELY \$6,010.00 SEIZED
10 FROM LAMASSU BTM LOCATED AT 4709
11 FLORIN ROAD, SACRAMENTO,
12 CALIFORNIA,

13 APPROXIMATELY \$6,125.00 SEIZED
14 FROM LAMASSU BTM LOCATED AT 2221
15 DEL PASO ROAD, SACRAMENTO,
16 CALIFORNIA,

17 APPROXIMATELY \$130.00 SEIZED FROM
18 LAMASSU BTM LOCATED AT 1744 N.
19 TEXAS STREET, FAIRFIELD,
20 CALIFORNIA, AND

21 APPROXIMATELY \$5,915.00 SEIZED
22 FROM LAMASSU BTM LOCATED AT 400
23 LINCOLN ROAD EAST, VALLEJO,
24 CALIFORNIA,

25 Defendants.

26 It is hereby stipulated by and between the United States of America and potential claimants Rehan
27 Alvi and Rubina Alvi (“claimants”), by and through their respective counsel as follows:

28 1. On or about November 26, 2019, the Homeland Security Investigations and Federal Bureau
of Investigation seized the above-referenced defendant assets pursuant to Federal seizure warrants
(hereafter collectively “defendant assets”).

29 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to
30 send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or obtain an
31 indictment alleging that the defendant assets are subject to forfeiture within ninety days of seizure, unless
32 the court extends the deadline for good cause shown or by agreement of the parties. That deadline was
33 April 17, 2020.

34 ///

1 3. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 16,
2 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

4 4. By Stipulation and Order filed June 25, 2020, the parties stipulated to extend to October
5 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

7 5. By Stipulation and Order filed October 14, 2020, the parties stipulated to extend to
8 December 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
10 to forfeiture.

11 6. By Stipulation and Order filed December 11, 2020, the parties stipulated to extend to
12 March 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
14 to forfeiture.

15 7. By Stipulation and Order filed March 16, 2021, the parties stipulated to extend to May 14,
16 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

18 8. By Stipulation and Order filed May 17, 2021, the parties stipulated to extend to August 12,
19 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
20 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

21 9. By Stipulation and Order filed August 10, 2021, the parties stipulated to extend to
22 November 9, 2021, the time in which the United States is required to file a civil complaint for forfeiture
23 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
24 to forfeiture.

25 10. By Stipulation and Order filed November 8, 2021, the parties stipulated to extend to
26 February 7, 2022, the time in which the United States is required to file a civil complaint for forfeiture
27 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
28 to forfeiture.

1 11. By Stipulation and Order filed February 4, 2022, the parties stipulated to extend to May 9,
2 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

4 12. By Stipulation and Order filed May 5, 2022, the parties stipulated to extend to August 5,
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

7 13. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
8 October 10, 2022, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
10 to forfeiture.

11 14. Accordingly, the parties agree that the deadline by which the United States shall be required
12 to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that
13 the defendant assets are subject to forfeiture shall be extended to October 10, 2022.

14 Dated: 8/2/22

PHILLIP A. TALBERT
United States Attorney

16 By: /s/ Kevin C. Khasigian
17 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

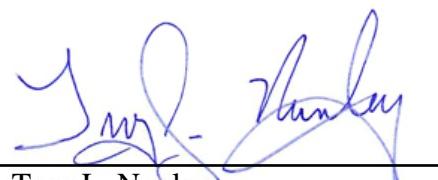
18 Dated: 8/1/22

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for Potential Claimants
Rehan and Rubina Alvi

21 (Signatures authorized by email)

22 **IT IS SO ORDERED.**

23 Dated: August 2, 2022



24 _____
25 Troy L. Nunley
26 United States District Judge
27
28